

RECEIVED
FEDERAL ELECTION
COMMISSION

2014 MAY 15 PM 1:31

OFFICE OF GENERAL
COUNSEL

Ryan M Reynolds
PO Box 16401
Savannah, GA 31416

ryan@bobjohnsonforcongress.com

May 14, 2014

Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

MUR # 6820

Dear Office of General Counsel:

I am in possession of information that gives rise to serious questions about possible violations of the Federal Election Campaign Act (the "Act") and Federal Election Commission regulations by Buddy Carter for Congress (FEC ID: C00543967). These allegations include the use of nonfederal state campaign committee funds to pay staff salaries for electioneering purposes in a federal election and transferring funds from the nonfederal committee to the candidate's federal campaign committee.

Since announcing his candidacy for federal office, Buddy Carter has continued to accept contributions prohibited by federal law into his state campaign account and has disbursed said funds in violation of federal law and for purposes related to a federal election.

The Bipartisan Campaign Reform Act (BCRA) prohibits federal candidates from accepting any contributions or disbursing any funds that do not comply with federal limits. Furthermore, candidates may not disburse funds in connection with a federal election that are not reported in accordance with the Act. Buddy Carter's state campaign disclosure reports show that he both accepted prohibited contributions and made disbursements in connection with a federal election in violation of federal law.

These violations indicate either incompetence on behalf of the Carter campaign or worse, willful violation of the law. We urge the Commission to immediately investigate these matters fully and take any and all action necessary to remedy these violations and prevent additional violations of the law.

Violation #1: Acceptance of Prohibited Funds accessed

Buddy Carter announced his candidacy for federal office on May 6, 2013 and announced he would not be running for reelection to the Georgia State Senate choosing instead to run for the US House of Representatives. He filed his statement of candidacy with the FEC on April 23, 2013. Since that time, his state campaign committee has accepted several contributions from sources prohibited by federal law. See Exhibit A.

Federal law prohibits a candidate for federal office from receiving funds in connection with any non-federal election from sources that are prohibited sources under the Act. 11 C.F.R. §300.62. By accepting these contributions into his campaign account, Buddy Carter has violated federal law.

Violation #2: Misuse of Nonfederal State Committee Funds

It has come to my attention that at least \$12,074.00 in salary has been paid from Buddy Carter's Georgia state campaign account to his federal campaign staff and consultants.

Please see Exhibit B where Sarah Varadin, a staff member for the Carter campaign, self-reported the commencement of her employment with Buddy Carter for Congress in mid-2013 on LinkedIn. Exhibit C shows payments to her from the state campaign and simultaneous disbursements from the federal campaign account.

Phillip Fordham was paid his salary from the state campaign account from April 24, 2013 through August 28, 2013. His salary was first paid by the federal campaign on September 12, 2013. During the time he was on payroll for the state campaign he was also being reimbursed for federal campaign expenses during the same period. See Exhibit D. Once he was transitioned to the federal payroll, he was not paid from the state campaign account again.

See also Exhibit E where the Carter campaign reported on Facebook the employment of Phillip Fordham and Sarah Varadin in reference to a fundraising event in July 2013.

David Simons, a consultant for the Carter campaign, was also paid using nonfederal campaign funds while assisting with Buddy Carter's run for Congress. Please see Exhibit F for a news report which references his position on the Carter campaign (see highlights). Exhibits C, G, & I each show reports referencing expenditures paid to Simons & Associates from the nonfederal committee. Simons & Associates is a firm owned by David Simons. The only payment to Simons in 2013 from the federal campaign account was on November 20, 2013 for "printed invitations." See Exhibit H.

Violation #3: Transfer of Nonfederal State Committee funds to a Federal Committee of the Same Candidate

The Carter campaign reported a transfer of \$1000 from his nonfederal state senate campaign committee on March 31, 2014. Please see Exhibit I. This transfer violates the prohibition on transfers between federal and non-federal campaign committees of the same candidate contained in 11 C.F.R. § 110.3. It is also a violation of 11 C.F.R. §300.6 which prohibits expenditures and transfers in connection with a federal election with funds that are not subject to the limits, prohibitions, and reporting requirements of the Act.

Conclusion

The above are clear violations of the Act. In effect, the Carter campaign has been using nonfederal state committee funds to illegally support and supplement his run for Congress.

Thank you for your attention to this matter. Please contact me if I can provide additional information that may be useful to the conduct of your investigation.

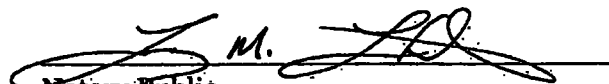
Sincerely,

Ryan M Reynolds, Complainant

I hereby swear and affirm that the facts presented in this complaint are true to the best of my knowledge, information and belief. Sworn pursuant to 18 U.S.C. § 1001.


Ryan M. Reynolds

Subscribed and sworn to before me this 14th day of May, 2014.


Notary Public

My Commission expires: 6/13/16



Exhibit A

State of Georgia
Campaign Contribution Disclosure Report
Itemized Contributions

Must list contributions received by a single contributor for which the aggregate total is more than \$100.00

Full Name of Contributor Mailing Address (Affiliation of Committee if any)	Contributor		Election Cycle	Cash Amount	In-Kind Contributions
	Received Date Contribution Type	a. Occupation & b. Employer			Estimated Value Description
Apollo Group, Inc 4025 S riverpoint Pkw ap cf-k501 Phoenix, AZ 85040	01/04/2013 Monetary		2013 General	\$500.00	\$0.00
CARD of Georgia PO Box 725154 Atlanta, ga 31139	01/04/2013 Monetary		2013 Primary	\$250.13	\$0.00
Consolidated Utilities 119 W Oglethorpe Ave Savannah, ga 31401	06/10/2013 Monetary		2013 Primary	\$250.00	\$0.00
Cook, Terry 124 Walter Barrett Rd McRae, GA 31055	01/02/2013 Monetary	a. Nursing Home Owner b. Self employed	2013 Primary	\$2,300.00	\$0.00
GA Hotel & Lodging Assoc. HotelPAC, Inc 233 Peachtree St NE Ste. 1400 Atlanta, ga 30303 (Hotel & Lodging Association)	01/08/2013 Monetary		2013 Primary	\$500.00	\$0.00
GDA PAC PO Box 1928 Duluth, GA 30096	01/03/2013 Monetary		2013 Primary	\$200.00	\$0.00
Georgia Dietetic Assoc. PAC 130 Woodcrest Dr Athens, ga 30606 (Georgia Dietetic Assoc.)	01/02/2013 Monetary		2013 Primary	\$250.00	\$0.00
Georgia Food Industry Association 1260 Winchester Pkwy SE Ste 216 Smyrna, ga 30080	01/07/2013 Monetary		2013 Primary	\$500.00	\$0.00

Accessed 5/11/14

Exhibit A

FILER ID: C2009000001

State of Georgia					
Campaign Contribution Disclosure Report					
Itemized Contributions					
Must list contributions received by a single contributor for which the aggregate total is more than \$100.00					
Full Name of Contributor Mailing Address (Affiliation of Committee if any)	Contributor		Election Cycle	Cash Amount	In-Kind Contributions
	Received Date Contribution Type	a. Occupation & b. Employer			Estimated Value Description
American Pharmacy Cooperative PO Box 728 Bessemer, AL 35021	12/02/2013 Monetary		2014 Primary	\$2,000.00	\$0.00
MAG Mutual Insurance Company PO Box 52979 Atlanta, ga 30355 (Medical Association of Georgia)	09/17/2013 Monetary		2014 Primary	\$500.00	\$0.00
Suntrust Bank Good Government Group PO Box 4418 Atlanta, GA 30302	11/27/2013 Monetary		2014 Primary	\$250.00	\$0.00

FILER ID: C2009000001

State of Georgia	
Campaign Contribution Disclosure Report	
<u>Summary of Itemized Contributions Received</u>	
In-Kind Total for this period:	\$0.00
Cash Contributions Total for this period:	\$2,750.00

Accessed 5/11/14

Exhibit A

FILER ID: C2009000001

State of Georgia					
Campaign Contribution Disclosure Report					
Itemized Contributions					
Must list contributions received by a single contributor for which the aggregate total is more than \$100.00					
Full Name of Contributor Mailing Address (Affiliation of Committee if any)	Contributor		Election Cycle	Cash Amount	In-Kind Contributions
	Received Date Contribution Type	a. Occupation & b. Employer			Estimated Value Description
Walgreens 1 Deerfield, IL 60015	01/06/2014 Monetary		2014 Primary	\$500.00	\$0.00

FILER ID: C2009000001

State of Georgia	
Campaign Contribution Disclosure Report	
Summary of Itemized Contributions Received	
In-Kind Total for this period:	\$0.00
Cash Contributions Total for this period:	\$500.00

Accessed 5/1/14

1507447007

Exhibit B

Sarah Vardian**Buddy Carter for Congress**

Savannah, Georgia (Savannah, Georgia Area) Government Relations

Join LinkedIn and access Sarah Vardian's full profile. It's free!

As a LinkedIn member, you'll join 300 million other professionals who are sharing connections, ideas, and opportunities.

- See who you and Sarah Vardian know in common
- Get introduced to Sarah Vardian
- Contact Sarah Vardian directly

[View Sarah's full profile](#)**Sarah Vardian's Overview**Current **Scheduler at Buddy Carter for Congress**Education **Suffolk University**
University of Rhode IslandConnections **8 connections****Sarah Vardian's Experience****Scheduler****Buddy Carter for Congress**

June 2013 – Present (1 year) Savannah, Georgia Area

Sarah Vardian's Skills & ExpertiseMedia Relations Public Relations Fundraising Strategic Communications Press Releases Social Media Event Planning
Nonprofits Event Management Political Campaigns Politics Volunteer Management**Sarah Vardian's Education****Suffolk University**

Bachelor of Science (B.S.); Political Science and Government

2010 – 2012

Grade: Cum Laude

University of Rhode Island

2008 – 2012

Contact Sarah for:

- career opportunities
- new ventures
- reference requests
- consulting offers
- expertise requests
- getting back in touch

View Sarah Vardian's full profile to...

- See who you and Sarah Vardian know in common
- Get introduced to Sarah Vardian
- Contact Sarah Vardian directly

[View Sarah's full profile](#)Not the Sarah Vardian you were looking for? [View more »](#)LinkedIn member directory - Browse members by country [a](#) [b](#) [c](#) [d](#) [e](#) [f](#) [g](#) [h](#) [i](#) [j](#) [k](#) [l](#) [m](#) [n](#) [o](#) [p](#) [q](#) [r](#) [s](#) [t](#) [u](#) [v](#) [w](#) [x](#) [y](#) [z](#) [more](#)

LinkedIn Corporation © 2014

Exhibit C

Friends of Tim Walmsley PO Box 10507 Savannah, GA 31412	11/19/2013 Expenditure		Campaign donation	\$150.00
Minuteman Press 100 Brampton Ave Suite 1E Statesboro, GA 30458	12/05/2013 Expenditure		Printing	\$583.10
Ralston for Representative PO Box 1196 Blue Ridge, GA 30513	10/30/2013 Expenditure		Campaign donation	\$1,000.00
Republican Leadership Georgia 50 Hurt Plaza SE Suite 900 Atlanta, GA 30303	11/08/2013 Expenditure		Sponsorship	\$250.00
Simons and Associates 127 Sweet Baily Cove Savannah, GA 31410	12/24/2013 Expenditure		Consulting fees	\$500.00
Simons and Associates 127 Sweet Baily Cove Savannah, GA 31410	11/01/2013 Expenditure		Consulting fees	\$250.00
Simons and Associates 127 Sweet Baily Cove Savannah, GA 31410	11/01/2013 Expenditure		Consulting fees	\$500.00
Simons and Associates 127 Sweet Baily Cove Savannah, GA 31410	07/01/2013 Expenditure		Consulting fees	\$250.00
The Georgia Peace Officer PO Box 1040 Reidsville, GA 30453	07/15/2013 Expenditure		Advertisement	\$200.00
The Georgia Report 566 Lakshore Dr Atlanta, GA 30307	11/05/2013 Expenditure		Subscription	\$199.00
Vardian, Sarah 1106 Drayton St Savannah, GA 31401	09/24/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$231.00
Vardian, Sarah 1106 Drayton St Savannah, GA 31401	10/08/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$198.00
Vardian, Sarah 1106 Drayton St Savannah, GA 31401	10/29/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$324.50
Vardian, Sarah 1106 Drayton St Savannah, GA 31401	11/19/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$302.50

Campaign Contribution Disclosure Report for 2013 December 31st - Non-Election Year - Original

Electronically Filed with the Georgia Government Transparency and

Campaign Finance Commission on: 12/31/2013 5:50:38PM -- Confirmation #C2009000001101329

Accessed 5/11/14

11007474100001

Exhibit C

Vardian, Sarah 1106 Drayton St Savannah, GA 31401	12/10/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$407.00
Vardian, Sarah 1106 Drayton St Savannah, GA 31401	12/18/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$385.00

FILER ID: C2009000001

State of Georgia Campaign Contribution Disclosure Report <u>Summary of Itemized Expenditures Made</u> Paid Expenditures Total for this period: \$17,039.50	
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Accessed 5/11/14

11087471/00000

Exhibit C

FILER ID: C2009000001

State of Georgia Campaign Contribution Disclosure Report Itemized Expenditures Must list expenditures made to a single recipient for which the aggregate total is more than \$100.00				
List Name and Mailing Address of Recipient	Expenditure Date Expenditure Type	Occupation & Employer	Expenditure Purpose	Amount Paid
Friends of Neal Florence PO Box 791 Lafayette, GA 30728	01/17/2014 Expenditure		Campaign donation	\$1,000.00
Georgia Senatorial Committee Inc PO Box 600 Dahlonega, GA 30533	01/10/2014 Expenditure		Caucus dues	\$250.00
Sarah, Vardian 1106 Drayton St Savannah, GA 31401	01/03/2014 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$390.50
Vardian, Sarah 1106 Drayton St Savannah, GA 31401	01/14/2014 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$429.00
Vardian, Sarah 1106 Drayton St Savannah, GA 31401	01/28/2014 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$341.00

FILER ID: C2009000001

State of Georgia Campaign Contribution Disclosure Report <u>Summary of Itemized Expenditures Made</u> Paid Expenditures Total for this period: \$2,410.50	
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Accessed 5/11/14

Exhibit C

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 97 OF 103

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

BUDDY CARTER FOR CONGRESS

Full Name (Last, First, Middle Initial)

A. SARAH J VARDIAN

Mailing Address 1106 DRAYTON

City

SAVANNAH

State

GA

Zip Code

31401

Purpose of Disbursement

MILEAGE REIMBURSEMENT

001

Candidate Name

Category/
Type

Office Sought:

☐ House☐ Senate☐ President

Disbursement For: 2014

☒ Primary☐ General☐ Other (specify)

State:

District:

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
11			07			2013			

Amount of Each Disbursement this Period

14.12

Transaction ID : SB17.6085

Full Name (Last, First, Middle Initial)

B. SARAH J VARDIAN

Mailing Address 1106 DRAYTON

City

SAVANNAH

State

GA

Zip Code

31401

Purpose of Disbursement

PAYROLL EXPENSE

001

Candidate Name

Category/
Type

Office Sought:

☐ House☐ Senate☐ President

Disbursement For: 2014

☒ Primary☐ General☐ Other (specify)

State:

District:

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
11			07			2013			

Amount of Each Disbursement this Period

517.28

Transaction ID : SB17.6092

Full Name (Last, First, Middle Initial)

C. SARAH J VARDIAN

Mailing Address 1106 DRAYTON

City

SAVANNAH

State

GA

Zip Code

31401

Purpose of Disbursement

PAYROLL EXPENSE

001

Candidate Name

Category/
Type

Office Sought:

☐ House☐ Senate☐ President

Disbursement For: 2014

☒ Primary☐ General☐ Other (specify)

State:

District:

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
11			21			2013			

Amount of Each Disbursement this Period

414.81

Transaction ID : SB17.6087

SUBTOTAL of Disbursements This Page (optional).....

946.21

TOTAL This Period (last page this line number only).....

Accessed 5/11/14

Exhibit D

State of Georgia Campaign Contribution Disclosure Report Itemized Expenditures Must list expenditures made to a single recipient for which the aggregate total is more than \$100.00				
List Name and Mailing Address of Recipient	Expenditure Date Expenditure Type	Occupation & Employer	Expenditure Purpose	Amount Paid
Carter, Amy 406 Purple Finch Dr Pooler, 31322	01/28/2013 Expenditure	a. Physican Therapist b. Memorial University	reimbursement for office equipment	\$507.33
Carter's Pharmacy, Inc 1017 E Hwy 80 Suite 10 Pooler, GA 31322	04/01/2013 Expenditure		Postage	\$679.62
Carter's Pharmacy, Inc 1017 E Hwy 80 Suite 10 Pooler, GA 31322	06/26/2013 Expenditure		Postage	\$469.20
Casas, Ann 281 Galesbery Dr Lawrenceville, GA 30044	01/12/2013 Expenditure	a. Fundraiser b. Self employed	Fundraiser assistance	\$340.00
Cecil Staton for Senate PO Box 26427 Macon, GA 31221	06/21/2013 Expenditure		Campaign contribution	\$2,000.00
Dean Burke for Senate 1501 Milali Ave Bainbridge, GA 39819	01/20/2013 Expenditure		Campaign contribution	\$1,000.00
Fordham, Phillip 75 John Wesley Dobbs Apt 302 Atlanta, GA 30303	04/24/2013 Expenditure	a. Student b. Self employed	Administrative assistance	\$1,200.00
Fordham, Phillip 245 John Wesley Dobbs Apt 205 Atlanta, GA 30303	06/05/2013 Expenditure	a. Student b. Self employed	Administrative Assistance	\$1,750.00
Fordham, Phillip 75 John Wesley Dobbs Apt 302 Atlanta, GA 30303	06/26/2013 Expenditure	a. Student b. Self employed	Administrative help	\$500.00
Landmark Communications 11300 Atlantis Place Suite F Alpharetta, GA 30022	05/03/2013 Expenditure		Newsletter production and delivery	\$8,904.42
Loudermilk for Congress PO Box 447 Cartersville, GA 30123	06/21/2013 Expenditure		Campaign contribution	\$1,000.00

Exhibit 40

**State of Georgia
Campaign Contribution Disclosure Report
Itemized Expenditures**

Must list expenditures made to a single recipient for which the aggregate total is more than \$100.00

List Name and Mailing Address of Recipient	Expenditure Date Expenditure Type	Occupation & Employer	Expenditure Purpose	Amount Paid
Carter's Pharmacy, Inc 1017 E Hwy 80 Suite 10 Pooler, GA 31322	11/03/2013 Expenditure		Postage	\$1,037.34
Carter's Pharmacy, Inc 1017 E Hwy 80 Suite 10 Pooler, GA 31322	12/31/2013 Expenditure		Postage	\$223.06
Carter's Pharmacy, Inc 1017 E Hwy 80 Suite 10 Pooler, GA 31322	07/12/2013 Expenditure		NCSL Registration fee	\$549.00
Chatham County Republican Party 11 E 73rd St Savannah, GA 31405	10/05/2013 Expenditure		Annual meeting sponsorship	\$1,000.00
Deal for Governor PO Box 2495 Gainsville, GA 30503	07/17/2013 Expenditure		Campaign donation	\$1,000.00
Deal for Governor PO Box 2495 Gainsville, GA 30503	12/10/2013 Expenditure		Campaign donation	\$5,000.00
Fordham, Phillip 209 W Gordon Lane Savannah, GA 31401	07/30/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$500.00
Fordham, Phillip 209 W Gordon Lane Savannah, GA 31401	08/14/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$500.00
Fordham, Phillip 209 W Gordon Lane Savannah, GA 31401	08/28/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$500.00
Fordham, Phillip 209 W Gordon Lane Savannah, GA 31401	07/02/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$500.00
Fordham, Phillip 209 W Gordon Lane Savannah, GA 31401	07/16/2013 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$500.00

Accessed 5/1/14

Exhibit D

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 66 OF 81

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

BUDDY CARTER FOR CONGRESS

Full Name (Last, First, Middle Initial)

A. PUBLIX

Mailing Address 595 PIEDMONT AVENUE NE

City	State	Zip Code
ATLANTA	GA	30308

Purpose of Disbursement
FUNDRAISER SUPPLIES

Candidate Name

Office Sought:	<input type="checkbox"/> House
	<input type="checkbox"/> Senate
	<input type="checkbox"/> President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

MM	DD	YY
07	11	2013

Amount of Each Disbursement this Period

32.65

Transaction ID : SB17.5264

[MEMO ITEM]

Full Name (Last, First, Middle Initial)

B. PUBLIX

Mailing Address 1380 ATLANTIC DRIVE NW

City	State	Zip Code
ATLANTA	GA	30308

Purpose of Disbursement
FUNDRAISER SUPPLIES

Candidate Name

Office Sought:	<input type="checkbox"/> House
	<input type="checkbox"/> Senate
	<input type="checkbox"/> President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

MM	DD	YY
07	11	2013

Amount of Each Disbursement this Period

140.37

Transaction ID : SB17.5280

[MEMO ITEM]

Full Name (Last, First, Middle Initial)

C. SAM'S CLUB

Mailing Address 15 MILL CREEK CIRCLE

City	State	Zip Code
POOLER	GA	31322

Purpose of Disbursement
FUNDRAISER SUPPLIES

Candidate Name

Office Sought:	<input type="checkbox"/> House
	<input type="checkbox"/> Senate
	<input type="checkbox"/> President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

MM	DD	YY
07	11	2013

Amount of Each Disbursement this Period

20.32

Transaction ID : SB17.5275

[MEMO ITEM]

SUBTOTAL of Disbursements This Page (optional).....

0.00

TOTAL This Period (last page this line number only).....

Accessed 5/11/14

1406201404001

Exhibit D

Image# 14960015647

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FEC MISCELLANEOUS TEXT RELATED TO A REPORT, SCHEDULE OR ITEMIZATION

Form/Schedule: SB17

Transaction ID: SB17.5264

PHILLIP FORDHAM - 7/11/13

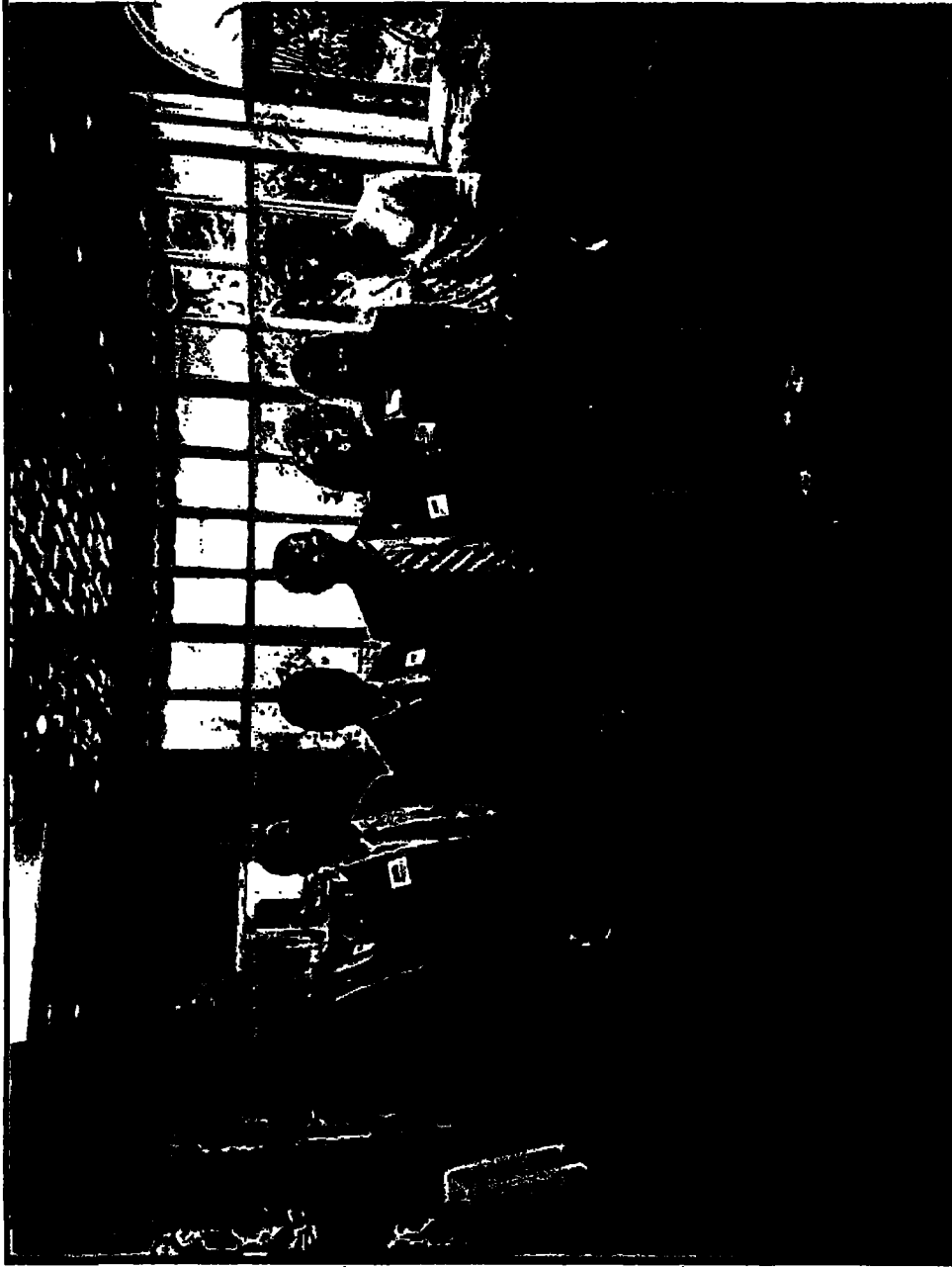
Form/Schedule: SB17

Transaction ID: SB17.6280

EARL LEROY CARTER - 7/11/13

Accessed 5/1/14

Exhibit E



Buddy Carter for Congress

The Buddy Carter for Congress Campaign had a tremendous month in June, capped off by a great fundraiser last Thursday. I was very proud of the team and I'm grateful for their effort. — with Philip Fordham, Peggy Lee Mowers and Sarah Jayne Vardian

Like Comment Share

37 people like this.

2 shares

Becky Kriss is that patrick??

July 3, 2012 at 4:09pm Like

Jake Young cute still Sarah!

September 22, 2012 at 11:27am Like

Write a comment...

Sponsored by

Create Ad

6 Reasons to Vote Kingston

Re-election on July 2nd

Visit here & learn more about the 6 conservative reasons to vote for Jack Kingston on May...

Stop NSA Spying

24thAugust.org

The NSA is violating YOUR rights. Sign the petition to stop them.

It's Middle Water

Mornings just got a little better. Fuel your coffee habit for less. Get \$1 back on each...

Like Page

Link:

<https://www.facebook.com/BuddyCarterforCongress/photos/a.603587066320241.1073741830.603247219687559/629777340367880/?type=1>

Accessed 5/13/14



Exhibit F

NEW!
SIGN UP FOR
ALL-ACCESS



MANAGE ACCOUNT ACTIVATE

Kingston to make Senate race official

Posted: May 2, 2013 - 12:56am

By SEAN HORGAN

U.S. Rep. Jack Kingston is scheduled to make an announcement late this morning at the Waving Girl statue in Morrell Park along the Savannah River.

The setting should be an apt one, because the betting is heavy throughout Georgia political circles that the Savannah Republican will be waving hello to a run for the U.S. Senate seat being vacated by Saxby Chambliss.

If, as expected, Kingston formally announces for the race that will culminate in the 2014 election, he will become the third Republican to enter the fray, joining two Republican contemporaries from the Georgia delegation, U.S. Reps. Paul Brown and Phil Gingrey.

Kingston, who recently turned 58, has served as the congressman from Georgia's 1st Congressional District since 1993. He is scheduled to make similar announcements today in other parts of the state.

Kingston was mentioned early on as a potential candidate for Chambliss' seat but remained non-committal as Brown and Gingrey entered the race. As recently as two weeks ago, Kingston said he was about a month away from deciding whether to run.

Kingston's actions, however, pointed to a formal candidacy. He spent the last two months traversing Georgia to test the level of interest in his candidacy and to lock up support.

He also raised money as a man aspiring to greater office, particularly in an off-election year for his House seat.

The most recent Federal Election Commission report showed Kingston raised \$842,580 in the first quarter of the year, leaving him with \$1,754,012 cash on hand.

Kingston also hired Republican pollster John McLaughlin of McLaughlin & Associates, a firm used in the past by Gov. Nathan Deal. And he hired a consultant for the first time in his political career, bringing on veteran Jeff Roe.

Beyond bringing the Senate race into clearer focus, Kingston's announcement of a formal candidacy would serve as a figurative starting gun for other local politicians looking to move up the political food chain.

State Sen. Buddy Carter, R-Pooler, the dean of the Chatham County delegation in the Georgia General Assembly, confirmed Wednesday that, if Kingston enters the Senate race, he will seek Kingston's seat in the U.S. House.

"We really want to be respectful to Jack and allow him this time in the spotlight," Carter said. "But we're going to announce Monday."

Carter already has filed a statement of organization with the Federal Elections Commission, naming Savannah accountant Carlton H. Hodges as the treasurer for Buddy Carter for Congress. He also has hired veteran Savannah political consultant David Simons and already put one poll in the field.

Others are eyeing the Kingston seat, as well.

Savannah resident David Schwarz, a former Kingston staffer and now the managing partner of the lobbying and economic development consulting firm of Pier Strategies, said Wednesday he has formed an exploratory committee to help him decide whether to run.

Jeff Chapman, the current state representative from Brunswick who resigned from the state Senate in 2010 to mount a failed bid for governor, also has been mentioned.

Darwin Carter, an Alma native who failed in bids for state agriculture commissioner in 2010 and the state House of Representatives in 2012, has announced he will run for Kingston's seat. To date, neither Chapman nor Darwin Carter has filed with the FEC.

Simons said the initial poll by the Buddy Carter organization, unverified by any objective polling, shows the state senator with a double-digit lead over the rest of the field of prospective candidates.

Exhibit F

Buddy Carter's pursuit of Kingston's congressional seat would open up his state senate seat, and state Rep. Ben Watson confirmed Wednesday he will run for the state's upper chamber if the Pooler Republican vacates the seat.

"If the dominos do fall, I will run for state senate," Watson said. "If Buddy doesn't decide to run, I'll be happy to stay in the House where I am, where I'm very comfortable."

There will be no shortage of candidates for Watson's seat if he tries to move up, according to Simons, who said he already has signed up to lend his services to Skidaway Island native Jesse Petrea.

[Back to Top](#)



CLOSE X

Exhibit 4

Newsblasters 11770 Haynes Bridge Rd Suite 20-352 Alpharetta, GA 30009	01/01/2013 Expenditure		Twitter, facebook support	\$697.00
Newsblasters 11770 Haynes Bridge Rd Suite 205-352 Alpharetta, GA 30009	05/01/2013 Expenditure		Twitter, facebook support	\$697.00
Newsblasters 11770 Haynes Bridge Rd Suite 205-352 Alpharetta, GA 30009	02/01/2013 Expenditure		Twitter, facebook support	\$697.00
Newsblasters 11770 Haynes Bridge Rd Suite 205-352 Alpharetta, GA 30009	03/01/2013 Expenditure		Twitter, facebook support	\$697.00
Newsblasters 11770 Haynes Bridge Rd Suite 205-352 Alpharetta, GA 30009	04/01/2013 Expenditure		Twitter, facebook support	\$697.00
Simons and Associates 11770 Haynes Bridge Rd Suite 205-352 Alpharetta, GA 30009	04/01/2013 Expenditure		Consulting fees	\$500.00
Simons and Associates 127 Sweet Baily Cove Savannah, GA 31410	01/12/2013 Expenditure		Consulting fees	\$500.00
Simons and Associates 127 Sweet Baily Cove Savannah, GA 31410	01/29/2013 Expenditure		St Patricks Day Ad	\$717.65

FILER ID: C2009000001

State of Georgia
Campaign Contribution Disclosure Report
Summary of Itemized Expenditures Made

Paid Expenditures Total for this period: **\$23,553.42**

Accessed 5/11/14

Exhibit H

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 89 OF 103

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 18a	<input type="checkbox"/> 19b
20a	20b	20c	21

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NAME OF COMMITTEE (In Full)

BUDDY CARTER FOR CONGRESS

Full Name (Last, First, Middle Initial)

A. SAVANNAH AIRPORT COMMISSION

Mailing Address 400 AIRWAYS AVENUE

City	State	Zip Code
SAVANNAH	GA	31408

Purpose of Disbursement
PARKING

002

Category/
Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y
10 / 31 / 2013

Amount of Each Disbursement this Period

48.00

Transaction ID : SB17.6138

[MEMO ITEM]

Full Name (Last, First, Middle Initial)

B. SHERATON - WDW DOLPHIN RESORT

Mailing Address 1500 EPCOT RESORT BLVD.

City	State	Zip Code
LAKE BUENA VISTA	FL	32830

Purpose of Disbursement
CAMPAIGN FUNDRAISER AT NAT'L PHARMACY CONVENTION

003

Category/
Type

Candidate Name:

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y
10 / 21 / 2013

Amount of Each Disbursement this Period

2234.20

Transaction ID : SB17.6187

Full Name (Last, First, Middle Initial)

C. SIMONS & ASSOCIATES

Mailing Address 127 SWEET BAILEY COVE

City	State	Zip Code
SAVANNAH	GA	31410

Purpose of Disbursement
PRINTED INVITATIONS

003

Category/
Type

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State:

District:

Date of Disbursement

M M / D D / Y Y Y Y
11 / 20 / 2013

Amount of Each Disbursement this Period

1812.34

Transaction ID : SB17.6130

SUBTOTAL of Disbursements This Page (optional).....

4048.54

TOTAL This Period (last page this line number only).....

Accessed 5/16/14

Exhibit I

FILER ID: C2009000001

State of Georgia
Campaign Contribution Disclosure Report
Itemized Expenditures

Must list expenditures made to a single recipient for which the aggregate total is more than \$100.00

List Name and Mailing Address of Recipient	Expenditure Date Expenditure Type	Occupation & Employer	Expenditure Purpose	Amount Paid
Buddy Carter for Congress PO Box 10570 Savannah, GA 31412	03/31/2014 Expenditure		Donation	\$1,000.00
Carter's Pharmacy, Inc 1017 E Hwy 80 Suite 10 Pooler, GA 31322	03/31/2014 Expenditure		Postage	\$507.26
Committee to Elect Roger Lane 123 Shipmaster Dr Brunswick, GA 31523	03/11/2014 Expenditure		Donation	\$500.00
Monroe Marketing PO Box 14558 Savannah, GA 31416	03/24/2014 Expenditure		Advertising	\$3,063.40
Simons and Associates 127 Sweet Bailey Cove Savannah, GA 31410	03/10/2014 Expenditure		Consulting	\$1,000.00
Skidaway Island Republican Club 28 Shellwind Rd Savannah, GA 31411	02/10/2014 Expenditure		Banquet table sponsorship	\$250.00
Vardian, Sarah 1106 Drayton St Savannah, GA 31401	02/25/2014 Expenditure	a. Administrative Assistant b. Friends of Buddy Carter for Senate	Administrative Assistance	\$115.50

FILER ID: C2009000001

State of Georgia
Campaign Contribution Disclosure Report
Summary of Itemized Expenditures Made

Paid Expenditures Total for this period: \$6,436.16

Accessed 5/11/14